

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO M. HERRERA-VELUTINI,

Defendant.

CRIMINAL NO. 22-342 (SCC)

**MOTION IN COMPLIANCE WITH COURT ORDER NO. 457  
AND REQUESTING BRIEF EXTENSION OF TIME**

**TO THE HONORABLE COURT:**

COME NOW the defendant Julio M. Herrera-Velutini (“the Defendant” or “Mr. Herrera”), through his undersigned attorneys, and respectfully states and prays as follows:

1. On January 22, 2024, the Court issued an order to Mr. Herrera requesting compliance with Local Rule 5 (c) for the translations submitted in connection with the Motion to Change Venue and related submissions, Dockets No. 342, 374, and 426 (and translations submitted at Dockets No. 434, 413, 428, and 341).

2. In compliance with said order, Mr. Herrera asked the Government if it had any objections to said translations. The Government informed that it did not have any objections as to the translated newspaper articles but would need additional time to review the transcripts (audio files). The Government informed it would not oppose this request for a brief extension.

3. Thus, Mr. Herrera requests additional time, until next Friday, February 2, 2024, to inform the court if there are any objections as to the translated transcripts (audio files).

**WHEREFORE**, it is respectfully requested that the Court take notice of the above information with regards to the translated newspaper articles and grant a brief extension of time with respect to the audio files.

Respectfully submitted in San Juan, Puerto Rico, on this 26<sup>th</sup> day of January 2024.

**DLA Piper (Puerto Rico) LLC**

/s/ *Sonia I. Torres-Pabón*

Sonia I. Torres-Pabón, Esq.  
USDC-PR No. 209310  
500 Calle de la Tanca, Ste. 401  
Sonia.torres@us.dlapiper.com  
San Juan, PR 00901-1969  
Tel: 787-945-9101

**The LS Law Firm**

/s/ *Lilly Ann Sanchez*  
Lilly Ann Sanchez, Esq.  
Fla. Bar No. 195677  
One Biscayne Tower, Suite 2530  
2 South Biscayne Blvd.  
Miami, Florida 33131  
Email: lsanchez@thelsfirm.com  
Telephone: (305) 503-5503  
Facsimile: (305) 503-6801

## **CERTIFICATE OF SERVICE**

It is hereby certified that on this same date the present motion was filed with the Clerk of the Court through the CM/ECF electronic system which will notify and provide copies to all parties of record.

In San Juan, Puerto Rico on this 26th day of January, 2024.

*/s/ Sonia I. Torres-Pabón*  
SONIA I. TORRES-PABÓN